

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259  
(DCG-JES-JVB)  
(consolidated cases)

**[PROPOSED] ORDER GRANTING THE UNITED STATES' MOTION TO COMPEL  
TEXAS LEGISLATIVE COUNCIL DOCUMENTS**

Upon consideration of the United States' Motion to Compel Texas Legislative Council Documents and TLC's opposition thereto, the Motion is GRANTED.

TLC is hereby ORDERED to produce documents over which it asserted legislative privilege but failed to identify the relevant legislator, including those set forth on pages 1-17 of the Challenged Document Index accompanying the United States' Motion to Compel Texas Legislative Council Documents, ECF No. \_\_\_\_.

TLC is hereby ORDERED to produce documents containing factual information; documents containing logistical information not sufficiently tied to legislative substance; and documents created after the enactment of the challenged redistricting plans, including those set forth on pages 18-73, 74-75, and 76 of the United States' Document Index.

TLC is hereby ORDERED to produce documents over which it asserts legislative privilege that relate to the 2021 Congressional redistricting plan, including those set forth on pages 77-87 of the United States' Document Index, to the extent no other privilege validly applies under the terms of this Order.

TLC is hereby ORDERED to produce documents over which it asserts attorney-client privilege without identifying the client, including those set forth on page 88 of the United States' Document Index, to the extent no other privilege validly applies under the terms of this Order.

TLC is hereby ORDERED to produce the draft legislative documents containing factual information over which it asserts attorney-client privilege, including those set forth on pages 89-128 and 129-31 of the United States' Document Index, to the extent no other privilege validly applies under the terms of this Order.

TLC is hereby ORDERED to produce for *in-camera* review the documents set forth on page 132 of the United States' Document Index over which TLC asserts attorney-client privilege but only summarily refers to "legal advice" being solicited as well as the documents set forth on page 133 of the United States' Document Index over which TLC asserts attorney-client privilege but which also appear to contain non-privileged information.

So ORDERED and SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2022.

---

HON. DAVID G. GUADERRAMA  
UNITED STATES DISTRICT JUDGE

*And on behalf of:*

Jerry E. Smith  
United States Circuit Judge  
U.S. Court of Appeals, Fifth Circuit

*-and-*

Jeffrey V. Brown  
United States District Judge  
Southern District of Texas